

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:) Case No. 20-20802-CMB
))
Kurt A. Resch,) Chapter 13
Kathleen A. Resch,))
 Debtors,))
) Related to Claim No. 5
Citizens Bank, N.A.,))
 Movant,))
))
 vs.))
))
Kurt A. Resch, Kathleen A. Resch and) Document No.
Ronda J. Winneccour, Chapter 13 Trustee,))
 Respondents.))

DECLARATION THAT THE EXISTING CHAPTER 13 PLAN IS SUFFICIENT

Come the Debtors, by and through their attorney, Francis E. Corbett, and present the following:

1. The new total payment reflects a small decrease in the amount currently being paid, which is \$180.01 per month.
2. The payment has fluctuated throughout the case and the plan is adequately funded for this change.
3. The new payment of \$185.50 should be incorporated into the Plan as of November 5, 2023.

Respectfully submitted,

DATED: 10/16/24

/s/ Francis E. Corbett
Francis E. Corbett, Esquire, PA I.D. #37594
fcorbett@fcorbettlaw.com
60 Hazel Drive
Pittsburgh, PA 15228
(412) 456-1882

WPAB FORM 7

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Certificate of Service of Declaration that the Existing Chapter 13 Plan is Sufficient

The type of service made on the party listed was First-Class Mail:

Citizens Bank, N.A.
One Citizens Bank Way JCA115
Johnson, RI 02919
Abby Rogan

And via NECF to the following:

Ronda J. Winnecur, Chapter 13 Trustee cmeclf@chapter13trusteedpa.com
Office of the U.S. Trustee ustpregion03.pi.ecf@usdoj.gov

EXECUTED ON: 10/16/24

/s/ Francis E. Corbett
Signature

Francis E. Corbett.
Typed Name

60 Hazel Drive, Pittsburgh, PA 15228
Address

(412) 456-1882 fcorbett@fcorbettlaw.com
Phone No. and E-mail Address

PA I.D. #37594
List Bar I.D. and State of Admission